

FILED

JUL - 1 2021

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
PECOS DIVISION

MARY CATHERINE "KATIE"  
SANCHEZ,

*Plaintiff,*

v.

PRESIDIO COUNTY, TEXAS, and  
FRANCES GARCIA,  
in her individual capacity,  
*Defendants.*

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P:19-CV-037-DC

VERDICT

Question 1

Did Plaintiff Katie Sanchez suffer an adverse employment action?

Answer "Yes" or "No."

Yes

If you answered "yes," proceed to Question 2. If you answered "no," you are finished.

Question 2

Did Plaintiff Katie Sanchez's political candidacy motivate Defendant Presidio County's decision to eliminate the Office of Management and Budget and her position?

Answer "Yes" or "No."

Yes

If you answered "yes," proceed to Question 3. If you answered "no," you are finished.

**Question 3**

Would Defendant Presidio County have made the decision to eliminate the Office of Management and Budget and Plaintiff's position in the absence of Plaintiff's political candidacy?

Answer "Yes" or "No."

No

If you answered "yes," you are finished. If you answered "no," proceed to Question 4.

**Question 4**

Did Defendant Frances Garcia have a retaliatory animus that caused the elimination of the Office of Management and Budget and Plaintiff's position?

Answer "Yes" or "No."

Yes

If you answered "yes," proceed to Question 5. If you answered "no," you are finished.

**Question 5**

Is Defendant Frances Garcia entitled to qualified immunity as to the First Amendment retaliation claim?

Answer "Yes" or "No."

No

If you answered "no," proceed to Question 6. If you answered "yes," you are finished.

**Question 6**

Answer the following question only if you answered "no" to Question 3 or "no" to Question

5.

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Katie Sanchez for her damages, if any, caused by Defendants Presidio County and/or Frances Garcia?

Answer in dollars and cents, if any, for the following items:

1. Compensatory damages in the past.

\$ 500,000

2. Compensatory damages in the future.

\$ 500,000

**Question 7**

Answer the following question only if you answered "no" to Question 5.


What sum of money, if paid now in cash, should be assessed against Defendant Frances Garcia as punitive damages?

Answer in dollars and cents, if any.

\$ 1,000,000

We, the Jury, have unanimously agreed to the answers in the above questions and return such answers to the Court as our verdict.

7/1/2021  
DATE

*Original signed by*  
  
*Jury Foreperson*  
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JURY FOREPERSON